

COMPLIANCE, COMMITMENT, AND CAPACITY: EXAMINING DISTRICTS' RESPONSES TO NO CHILD LEFT BEHIND

Abstract

Evolving purposes for the United States educational system have driven legislative policy over the past 40 years, beginning with the Elementary and Secondary Education Act of 1965, reauthorized as the No Child Left Behind (NCLB) Act in 2002. However, researchers have demonstrated US policy intents are often unrealized in educational practice, calling for studies to elucidate how P–12 districts implement federal policy mandates. Organizational theory and historical patterns provide predictions for districts' responses, but fail to adequately explain how and why P–12 districts respond to federal policy mandates as they do, nor do they offer sufficient guidance for policymakers seeking to improve student outcomes. This article presents findings of two case studies conducted to describe and explain the response of P–12 districts to policy mandates introduced through federal legislation. Both cases are bounded by the 2001–2007 time period, and explore the districts' organizational responses to NCLB as reported by district and school administrators. The first case study, conducted in a mid-sized, Midwestern suburban district, was designed to test the conceptual framework and methodology. Using replication logic, a second case study in a large, Midwestern urban district allowed exploration of how varying contextual factors influence districts' responses to NCLB. Within- and cross-case analyses led to creation of the Compliance, Commitment, and Capacity Model (CCCM) to illustrate districts' responses to policy mandates. Loosely connected to the Concerns Based Adoption Model (CBAM) developed by Hall and Hord (2001), CCCM goes beyond CBAM's explanation of individual responses to change by describing organizational responses to mandates initiated through federal legislation. Findings suggest P–12 districts' bureaucratic responses to educational reform mandates are insufficient to produce deep changes in educational practice. In addition, accountability-based policies such as NCLB do not provide adequate guidance and support to build district capacity for change. Further research is suggested to elaborate the CCCM model as a tool for policymakers and district change agents.

Introduction

The complexity of translating educational policy reforms into practice has been well established by researchers (Cohen, Moffitt, & Goldin, 2007; Darling-Hammond, 1990). Plans laid by policymakers are often

not realized, or are reshaped through practice (Darling-Hammond, 1990). A straight line cannot be drawn between legislative policy mandates and local results aligned to policy intents. This is because planning and changing are fundamentally different processes.

A dictionary search for planning and changing reveals their differences. Planning has a fairly straightforward definition: It is “the act or process of making plans; specifically, the establishment of goals, policies, and procedures for a social or economic unit” (Merriam-Webster Online Dictionary, 2009). By definition, policymakers plan, hoping to compel change. However, while planning outlines a pathway for change and desired outcomes, it does not guarantee anticipated results. In contrast, changing yields shaded synonyms for the word change, ranging from alter and modify, or “to make different in some particular but short of conversion into something else,” to transform and convert, or “to make over to a radically different form, composition, state, or disposition” (Merriam-Webster Online Dictionary, 2009). Change takes place within the object itself, not within the planning process. Hence, the work of “making things different” in districts and schools takes place within the local context, through interactions of actors and resources within the system (Cohen et al., 2007; Cohen, Raudenbush, & Ball, 2003).

Sometimes school change is effected through federal policy mandates. However, the success of P–12 educational reform policies in the United States has been spotty, at best (Hannaway & Woodroffe, 2003). This has led scholars and policymakers to query how districts and schools actually respond to policy mandates, hoping this improved understanding may untangle the Gordian knot kinking up the intricate web between planning, policymaking, and educational change (Cohen, et al., 2003) Planning is also used at the local level to effect change, making it important to understand how districts and schools plan in response to policy mandates, and what implementation effects result.

It is especially important to explore how districts respond to educational policies intended to reform teaching and learning, given the increased pressure on schools to increase academic achievement (Cohen & Hill, 2007). Arguably the most ambitious learning policy initiated by the federal government, the No Child Left Behind Act (2002) laid plans to reform P–12 schools and dramatically improve student achievement. Therefore, the purpose of this study is to describe and explain the response of P–12 districts to NCLB, adding to the research dialogue on federal policy implementation at the local level. Three exploratory questions framed the study: (a) How do P–12 administrators learn about and assess mandate requirements? (b) How do P–12 administrators respond to mandates and monitor district implementation? and (c) What administrative challenges are created by these mandates? What conflicts do they pose for districts? Data was collected through two case studies, involving interviews with district and school administrators, their external partners at the state

and regional levels, and review of district documents. Through within-case and comparative analyses of the data, conclusions were developed to describe and explain how P-12 districts respond to legislative mandates.

This article proposes that districts' responses to legislative mandates may be explained through the "Compliance, Commitment, and Capacity Model" (CCCM). CCCM is loosely based on the Concerns-Based Adoption Model (CBAM), Hall and Hord's (2001) expansion of Fuller's (1969) ground-breaking concerns theory. CCCM explains how districts respond as they confront critical tasks related to compliance, commitment, and capacity.

Organized in five sections, the article presents the study and develops support for the CCCM model. First, the research literature underscoring the theoretical and historical context for educational policy and practice over the past forty years is briefly examined. Next, the study's conceptual framework and methodology conveys the research schema for the case studies. The third section presents study findings, while the fourth section discusses findings, presents the CCCM model, and notes study limitations. The final section proffers conclusions suggested by the findings and current literature.

Theoretical and Historical Contexts

While policy mandates pose challenges for P-12 districts, they also offer a litmus test for organizational theories by measuring how well they predict districts' responses. In addition, historical dynamics between educational policy and outcomes provide another way to predict districts' responses to federal policy mandates.

Theoretical Context

Organizational theorists posit ongoing challenges promulgated through the external environments of P-12 districts. These challenges include persistence of educational structures, purposes, and reforms; organizational boundary issues; and compliance with external demands (Ogawa, Crowson, & Goldring, 1999). The persistence of P-12 educational structures is well documented (Cohen, 1985). Despite social and economic changes during the twentieth century, the grammar of education has remained remarkably intact (Tyack & Cuban, 1995).

In addition, the diversity of public values, translated into educational goals and purposes, complicates the task of schooling the nation's youth. Labaree (1997) describes three conflicting goals for schools, including "democratic equality, social efficiency, and social mobility" (p. 41), with these competing values creating a strain for primacy between social and economic purposes for education. As Cohen (1985) trenchantly notes, "American(s) have been singularly unable to think of an educational purpose that they should not embrace...[Hence], educators have tried to

solve the problem of competing purposes by accepting all of them” (pp. 35–36), leading to certain failure. Cycles of reform and school action thus stem from deeply embedded conflicts between democratic values and a capitalist economy (Tyack & Cuban, 1995).

Theorists differ in their views of organizations, boundaries, and relationships with their task environments, with positivists embracing the view that organizations seek to reduce uncertainty by producing rational, predictable outcomes (Kezar, 2001). NCLB is inherently positivist, promoting increased rationality and accountability of schools as a lever to increase student achievement. At the organizational level, positivist theory portends P–12 districts’ responses to policy mandates. Districts would become more bureaucratic as they respond to external mandates (Weber, 1947).

Contingency theorists postulate that organizations develop in relationship to their external task environments. When policy demands are imposed through a rapidly changing, diverse task environment, which describes the current policy environment of P–12 education, contingency theory posits districts would respond in predictable ways to address the demands. These include increased specialization of organizational structures to meet policy requirements, increased coalitions with others in authority, increased monitoring and coordination with the task environment, and heightened administrative decision making at top levels of the organization (Thompson, 1967). Hence, under NCLB requirements, contingency theorists would expect to find districts assigning NCLB related work to individuals and departments with specialized expertise (i.e., assessment, teacher qualifications, or grant budgets), working to build influential relationships with authority figures (i.e., state department of education representatives), spending more time gathering information about NCLB and related requirements, and making more centralized decisions with other district level administrators with specialized expertise and responsibilities.

Institutional theorists also elevate the importance of the P-12 task environment, predicting districts would incorporate institutional elements as they seek to become more isomorphic with the institutional environment (Rowan, 1982). Thus, districts may sacrifice rational organizational goals in favor of increased legitimacy through assimilation of institutional norms, values, and rules (Meyer & Rowan, 1977). Thus, they would predict adoption of NCLB values and language within districts, including NCLB’s prevailing rhetoric that all children can learn at high levels. Moreover, decoupling structural subunits such as grade levels and classrooms may allow school leaders to focus on administration of institutional rules (i.e., state-mandated testing requirements) rather than daily educational functions (Rowan & Miskel, 1999). Recent institutional theories include consideration of how organizational and institutional dynamics mediate policy implementation (Burch, 2007).

While these theoretical contributions help to explain the contingencies posed by the task environment for P–12 schools (Thompson, 1967),

there are increasing numbers of districts struggling with educational funding and declining real revenues nationwide (Odden & Picus, 2004). Thus, it is more difficult for educational bureaucracies to develop specialized positions, curricula, and programs in response to NCLB, a favored bureaucratic response to demands for change predicted by positivist theory.

Furthermore, it is important to place “leadership” as a construct within the study. Leithwood, Louis, Anderson, and Wahlstrom’s (2004) landmark Wallace Foundation report defines three sets of practices that comprise the critical contributions of leadership to student learning, including setting goals, developing people, and redesigning the organization. Under NCLB’s requirement for improving student achievement, their research findings imply that effective district responses would be enacted through these essential practices.

Historical Context

The track record of P–12 educational reform policies in the United States is less than stellar. While educational policy demands are not new, targeted purposes have shifted significantly over the past forty years, in part due to changes in the political climate, and also because of their largely unsuccessful outcomes (Vinovskis, 2009). Two federal educational policies bracketing this time span—the Elementary and Secondary Education Act (ESEA) in 1965, and the No Child Left Behind Act (NCLB) of 2002—highlight the changes in policymakers’ operational assumptions and targets. Under ESEA, the government poured funds into public schools, intending to provide greater educational opportunities for disadvantaged youth and increase the academic performance of low achieving students. ESEA failed to produce significant changes in student achievement, so as the national standards movement swept the country in the late 1980s and 1990s, policymakers began to focus on students’ opportunities to learn defined, rigorous academic content (Vinovskis, 2009). Many states voluntarily developed content standards and statewide testing programs. However, student achievement on state tests and national and international measures did not demonstrate a trend of improvement, and in some areas, student performance declined (Harris & Herrington, 2006). Concerns swelled over the United States’ declining international performance on educational measures such as the Program for International Student Assessment (PISA) and data reported by the Trends in International Math and Science Study (TIMSS) (Darling-Hammond, 2007). Increasing competition for jobs and market shares from countries such as India and China has heightened the nation’s sense of urgency over students’ ability to compete for high level positions and the United States’ increasingly precarious status as a world leader (Friedman, 2005). Given past educational policy failures to increase student achievement, policymakers thus swung their attention to student performance on state tests as a metric of

educational effectiveness. The policy focus moved from educational inputs—funding and content standards—to educational outputs—student achievement. Hence, the passage of the No Child Left Behind Act of 2002 institutionalized the policy shift to state performance measures as a way of holding schools accountable for student learning (Vinovskis, 2009).

NCLB has been in place for seven years, and reports of its effectiveness in leveraging increased student achievement are mixed. Declarations of NCLB's effects in reducing achievement gaps have been called into question by numerous researchers, citing differences between national and state content standards, the varying levels of rigor used by states to determine student proficiency, lack of valid and reliable longitudinal assessment data across states, and the difficulty of establishing a causal relationship between NCLB's enactment and post-NCLB gains due to overlapping state and local improvement efforts (Fuller, Wright, Gesicki, & Kang, 2007; Jennings & Rentner, 2006; Lee, 2008; Mintrop & Sunderman, 2009).

In some cases, states appear to be lowering their proficiency standards, perhaps hoping to boost more schools into demonstrating adequate yearly progress. A National Center for Education Statistics (NCES) report (Bandeira de Mello, Blankenship, & McLaughlin, 2009) compared state proficiency standards to the National Assessment of Educational Progress (NAEP) scales, revealing that 50% of states changed their standards from 2005 to 2007, preventing comparability of their test scores. Furthermore, one third to one half of states with data from both years (variance based on grade level and test) showed a decrease in state proficiency standards.

Even crediting modest achievement gains to NCLB, researchers question whether accountability-driven educational policy will ever be sufficient to ensure universal student proficiency and elimination of achievement gaps between student subgroups (Harris & Herrington, 2006). A better understanding of how P–12 districts respond to federal policy mandates is needed to promote more effective policy and enhance state and local efforts to improve student outcomes.

This study was undertaken to describe and explain the response of P–12 districts to federal policy mandates, specifically NCLB. The following exploratory questions informed development of the study's conceptual framework and methodology:

- How do P–12 administrators learn about and assess mandate requirements?
- How do P–12 administrators respond to mandates and monitor district implementation?
- What administrative challenges are created by these mandates? What conflicts do they pose for districts?

The findings reported in this article present a model for understanding, analyzing, and predicting districts' responses to educational policy mandates.

Conceptual Framework and Case Study Methods

To define the study, a preliminary conceptual framework (Figure 1) was developed, “bounding the territory” of study constructs and relationships between them (Miles & Huberman, 1994, p. 25).

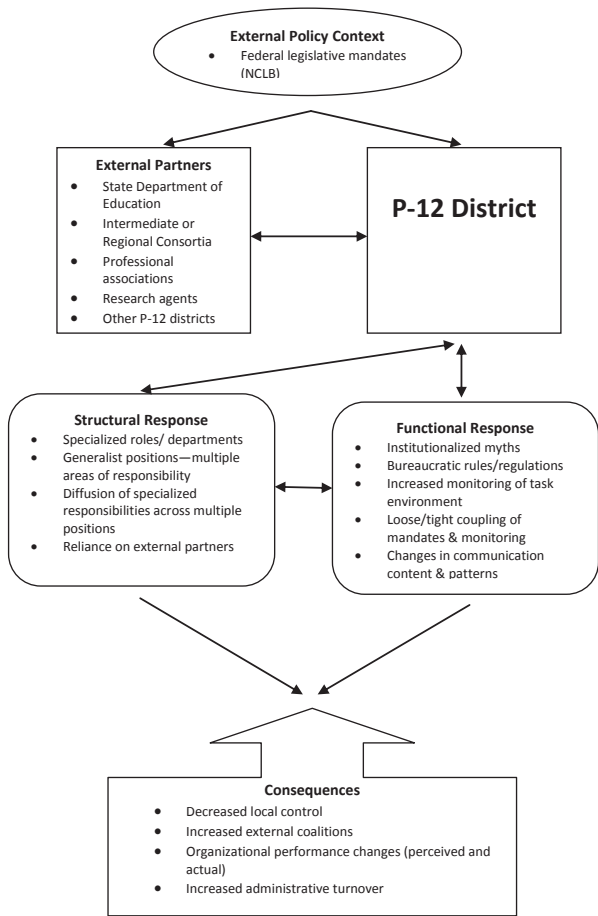


Figure 1. P–12 districts’ organizational responses to external mandates in curriculum, instruction, and assessment.

Organized into shapes, the framework identifies the conceptual entities and constructs involved in district responses to external mandates. By definition, a federal legislative policy is a top-down initiative, so the conceptual framework’s flow reflects a top-to-bottom orientation, though influence between the levels may be bi-directional. The oval at the top of Figure 1 shows the External Policy Context for P–12 districts, established through federal legislative mandates; in this case, the policy context for the study

is limited to NCLB. The unit of analysis is the *P-12 District*, with its administrators as the chief informants reporting on the district's organizational responses to federal policy mandates. Next to the P-12 district, the *External Partners* include state, regional, and local entities, including state departments of education, intermediate or regional consortia, professional educators' associations, research agents or partners, and other P-12 districts. These external partners are posited to support districts as they respond to external mandates, thus influencing their structural and functional responses, shown in the rounded squares. The district's *Structural Response* reveals possible organizational configurations, delineating responsibilities for external mandate requirements within particular roles and departments. In contrast, the *Functional Response* of districts reflects P-12 administrators' behaviors and actions relative to external mandate requirements. Finally, the possible *Consequences* of the external policy mandates, mediated through the P-12 district's structural and functional responses, are shown in the arrow-shaped box at the bottom.

Sampling

In case study research, the purpose for sampling is not selection of a representative sample reflecting a population. Rather, case study samples seek to "expand and generalize theories (analytic generalization) and not to enumerate frequencies (statistical generalization)" (Yin, 2003). A pilot study in a mid-sized, Midwestern suburban district guided development of the primary case study, yielding valid, useful data incorporated in the overall study. Following the pilot study, another district in the same state was identified for data collection and developed into a case using Yin's replication logic (p. 47). As a large urban district, the second case study district differed from the first district in size and location, allowing exploration of how these factors affected their structural and function responses to mandates.

Case Study Parameters

The studies were bounded by four within-case sampling parameters, including settings, actors, events, and processes (Miles & Huberman, 1994). Sampling of these elements was aligned to research questions and the conceptual framework. The case study settings included Fairview Community Schools, the pilot study site, a medium-sized suburban district of approximately 3,400 students, and Steele Public Schools, an urban district with approximately 7,000 students¹. The time sample spanned six years, from approximately 2001 to 2007, allowing exploration of district responses to NCLB over time. Actors totaled 21 individuals (see Table 1), including personnel from the study districts ($n = 18$), the state department of education ($n = 2$), and one intermediate school district ($n = 1$). Actors participated in semi-structured interviews or a focus group discussion (see

Appendix) ranging from 30 to 60 minutes in length, responding to questions about district responses to NCLB, the event sampled in the study. More than simply informants reporting on their experiences with NCLB, the term “actors” implies the complex behaviors of administrators acting and interacting within their local contexts. Finally, a variety of processes within each district were sampled, including distribution of responsibilities for mandate requirements and changes in allocation of responsibilities; bureaucratic rules, regulations, and communication patterns within districts to determine institutionalization of mandates; district level decision making about implementation and fidelity to mandate requirements; and processes used by administrators employed to determine what to do and what to ignore in response to mandate requirements.

Table 1
Interview and Focus Group Participants (N = 21)

District and position titles	<i>n</i>	Years of service in position
Fairview Community Schools (FCS) interviews		
Superintendent	1	3 (+4) ^a
Director of Educational Services	1	4 (+2) ^a
Director of Finance	1	1.5
Director of Human Resources	1	4 (+3) ^a
High School Associate Principal	1	1 (+17) ^a
Elementary School Principal	1	1.5 (+3.5) ^a
Total	6	
FCS focus group participants		
Elementary School Principal	2	10 8
Middle School Principal	1	13
High School Principal	1	7 (+5) ^a
Total	4	
Steele Public Schools (SPS) interviews		
Superintendent	1	9
Deputy Superintendent of Finance	1	23
Assistant Superintendent of Student Achievement	1	5 (+10) ^b
Director of Special Services	1	4
Testing Coordinator	1	5 (+7) ^c
Director of Grants/Instructional Specialist	1	7
High School Principal	1	4 (+2) ^a
Elementary School Principal	1	<1 (+5) ^a
Total	8	

(continued)

Table 1 (*continued*)

District and position titles	<i>n</i>	Years of service in position	
State Department of Education (SDOE) interviews			
NCLB Specialist	1	<1	(+10) ^c
Federal Grants Field Consultant	1	6	
Total	2		
Intermediate School District (ISD) interviews			
Assistant Superintendent of Instruction	1	<1	(+10) ^a
Total	1		
Total interview participants	17		
Total focus group participants	4		
Total participants	21		

Note. ^a(+x) indicates additional administrative experience in similar positions. ^bPrevious administrative experience at state department of education. ^cPrevious experience as a district assistant superintendent of instruction.

Data Collection and Analysis

Two primary types of data were collected, including interview and focus group data, and documents (state monitoring reports, district strategic plans, district and school improvement plans, and meeting agendas and minutes). Audiotaped interviews and the focus group discussion were conducted on site and transcribed for later analysis. A focus group discussion was conducted only in Fairview, the pilot study, as the interviews proved to yield more comprehensive and varied data. Member checks provided informants an opportunity to review transcripts and provide feedback (Lincoln & Guba, 1985). Documents were also obtained from informants, allowing triangulation of interview and document data.

Interview and focus group data and documents were analyzed and weighed against the conceptual framework (Figure 1) established at the study's outset. Data was reviewed many times to elaborate patterns and construct possible explanations. Thus, as patterns and themes emerged, the data was coded, reviewed for accuracy, tested for contradictory explanations, and analyzed inductively for findings (Yin, 2003).

Findings

The Fairview and Steele cases were first analyzed separately. When the cross case analysis was completed, it was clear they displayed more similarities than differences in their responses to NCLB. This section includes a discussion of the different district contexts and factors that

contributed to their responses to NCLB, and comparison of findings and themes from the cases organized by exploratory questions.

Different Contexts and Factors Contributing to Districts' Responses

The study districts were selected for their differences on a number of variables, including student enrollment and setting. Nonetheless, they have challenges in similar areas, albeit with some contextual differences, in the areas of leadership, decreased revenues, and student achievement and community concerns.

Leadership. Both districts experienced significant reductions in leadership and support positions because of budget cuts. In Steele, administrative positions were cut by 25% over a five year period, primarily through retirements, allowing for consistency in many leadership positions. In Fairview over a nine year period, administrative positions were decreased by 40%; additionally, there was marked turnover in remaining leadership positions due to forced resignations, attrition, and retirement. The reduction of positions in both districts resulted in administrators taking on new responsibilities, sometimes outside their area of expertise. In addition, NCLB requirements increased the need to collaborate across positions. Leaders reported feeling stretched and overwhelmed by their responsibilities. In both districts, they exercised discretion in deciding where to focus their time and energy, reporting that they spent more time coordinating response to NCLB requirements (i.e., implementing assessments and ensuring teachers met highly qualified guidelines), and for central office administrators, less time in schools. Principals reported being torn between management and instructional leadership responsibilities, with less time in classrooms than they would have liked.

Decreasing revenues. Decreasing revenues was a common factor in Fairview and Steele, contributing to how they responded to the legislative mandates. From 2001 to 2005, based on figures provided by Fairview and Steele administrators, both districts experienced declining student enrollment. Fairview's enrollment went from 3,606 to 3,520 (net loss of 86 students, or about 2.4% of its total enrollment). Steele's enrollment changed from 7,376 to 6,894 students (net loss of 482 students, or about 6.6% of its total enrollment). Fairview has partially ameliorated their declining enrollment through increased Schools of Choice student enrollment. As districts in the same state, both Fairview and Steele are apportioned funds based on a per-pupil allocation². With lower per-pupil funding, Steele is more reliant on federal and state grants to do some of the work they find important. Declining real revenues led to capacity and resource issues in both districts, leading to a school closure in Fairview and in Steele, reductions in administrative and teaching staff, larger class sizes in some grades, delayed capital expenditures, and other cost-cutting measures.

Student achievement and community concerns. Student achievement and community concerns highlight the disparities between Fairview and Steele. Fairview's student achievement was relatively high. In 2006, Fairview achievement scores demonstrated 87.8% of students were proficient in reading and 81.2% of students were proficient in math. Their high school graduation rate was 92.6%. Furthermore, 70.4% of Fairview adults ages 25 and older possessed at least a bachelor's degree and parents "understand the school game," as described by a Fairview principal. Fairview administrators reported parents tend to be highly involved and noted the district often faces competing demands from special interest groups. In this context, Fairview administrators found themselves answering to Board members verbalizing concerns about achievement gaps for minority and socio-economically disadvantaged students, while also fielding parent complaints about the decreased emphasis on gifted and talented services for students. Fairview Board minutes revealed parents actively lobbied the Board and administrators for various academic programs such as increased Advanced Placement courses at the high school, math tutoring support at the middle school, technology instruction at the elementary schools, and continuation of the full day kindergarten program. Thus, academic achievement was a high priority in the Fairview community, at least among activist parent groups seeking to advance their children's achievement. At the community level, it was less common to hear parents verbalizing concerns about achievement gaps or the needs of lower achieving students.

In contrast, Steele has been dogged by flagging student achievement and graduation rates. In 2006, 70.1% of Steele's students achieved reading proficiency, while 56.2% of its students scored proficient in math. Student graduation rate was 56.6%. In addition, overall parent involvement was low. The percentage of adults 25 and older with a bachelor's degree or higher was 13.1%. Steele administrators commented that many parents did not have positive school experiences themselves, and appeared to avoid coming into the schools unless their children were in trouble. Board minutes reflected few incidents of parents speaking to the Board about academic concerns. Moreover, increasing unemployment in the Steele community, due to the decline of its manufacturing base, led to increased poverty and economic pressures. According to Steele administrators, there was not a broad, strong academic press in the Steele community. Minority Board members helped to keep achievement gaps and low graduation rates as a target for district improvement. However, Steele administrators reported a sense of urgency about improving student achievement under NCLB, at least among the administrative group.

Exploratory Research Questions and Common Themes

Differences notwithstanding, similar patterns surfaced in comparing the data and findings from Fairview and Steele. Common themes are

reported under their related exploratory research questions, reflecting how P-12 administrators learn about and assess mandate requirements, how they respond to the requirements and monitor implementation, and administrative challenges and conflicts experienced by the districts relative to the mandates. These exploratory questions and findings represent the unfolding responses of Fairview and Steele to NCLB over time, mediated by their administrators working with their school and community contexts.

How do P-12 administrators learn about and assess mandate requirements? The districts' early responses to NCLB involved gathering information from External Partners, followed by internal communication and collaborative assessment of compliance requirements. In both districts, the first stage of response to NCLB was a hectic time, fraught with uncertainty and efforts to ensure they accurately comprehended NCLB requirements.

Gathering information from External Partners. In the early months following NCLB's passage, Fairview and Steele's responses were marked by information gathering through official channels and resources for technical assistance, starting with the State Educational Agency (SEA), which packaged and disseminated information from the U.S. Department of Education. Information made its way from the SEA to the regional intermediate school districts (ISD) and professional associations. Fairview also engaged in ISD stakeholder meetings with colleagues in like positions from other districts; the Director of Educational Services commented that this group was "most influential...they could put things in a nutshell and say this is what's going to happen, and this is how it is going to affect you."

Overall, both Fairview and Steele relied heavily on External Partners to provide and synthesize key information. This taxed SEA administrators, who did not always have answers to provide. The SEA Field Consultant noted state department personnel sometimes had difficulties interpreting NCLB requirements, so they would call the US Department of Education for an explanation.

And sometimes they'll say, 'I really don't know either, let me check with our lawyers,' or maybe they'll say, 'I don't know, but I saw something from another state, it seems like they've got that part of the law figured out.' Because in the early parts of it...I think it's safe to say that nobody has a clear view other than maybe the drafters of the law...and then as guidance comes out, unfortunately it comes labeled 'Draft Guidance,' because I think the federal government still wants to have some legal room to change what they meant...it gets, I'm sure, a very politicized process in Washington, D.C. about what...it means.

In turn, ISDs parsed and communicated information from the state to the local districts. As the ISD Assistant Superintendent reported, the state "often tap(s) us for development work around the mandates, how the State will meet the mandates [and] how the mandates play out for local dis-

tricts.” Fairview’s superintendent commented on the robust SEA and ISD supports, noting “You have to be asleep at the switch for a long time to not understand this information is coming your way.”

Internal communication and assessment. Before implementing NCLB locally, both districts entered an intense internal communication period to educate administrators about NCLB and its requirements. Given NCLB’s scope and complexity, this was a large task, requiring increased collaboration and meeting time. Fairview’s Director of Educational Services reported feeling overwhelmed, commenting, “It was huge. You had to be Johnny-on-the-Spot with everything that was happening... [So] I got the administrative folks involved...because I needed more hands on deck.” The administrators spent a great deal of time doing what she described as “dissect[ing] it down and figur[ing] out how it was going to affect [us]...and trying to see how we all fit in.” Steele’s superintendent took on the responsibility of “putting systems in place,” usually after conferring with the Assistant Superintendent, who had greater depth of NCLB-related knowledge due to her tenure and connections with the state department of education. In addition to school year meetings, Steele’s Assistant Superintendent ran what she dubbed “NCLB Boot Camps” in the summer for district and building administrators.

How do P–12 administrators respond to mandates and monitor district implementation? Following initial information gathering and internal communication and assessment, early implementation of basic NCLB compliance requirements was handled through traditional bureaucratic processes in both districts. These processes included assignment of responsibilities to various administrators, developing district protocols and regulations for implementation of requirements, and developing channels of communication and accountability.

Assignment of responsibilities. Fairview and Steele made clear administrative assignments for NCLB responsibilities, primarily to individuals with related expertise. Thus, implementing and monitoring assessments was assigned to central office administrators in charge of assessment and instruction, while grant budgeting and monitoring was overseen by finance officers. Similarly, ensuring implementation of highly qualified teacher requirements was the responsibility of human resource administrators in both districts, but in Steele was later reassigned by the Superintendent to the Assistant Superintendent when tasks became “mucked up over in HR.” Job titles in the Assistant Superintendent’s office were changed to reflect their new responsibilities and focus. The latter portion of the Assistant Superintendent’s title was changed from “Student Programming” to “Student Achievement,” and her administrative assistant became the “NCLB Compliance Coordinator.”

In addition, collaboration between administrators increased to handle the new requirements (i.e., Directors of Human Resources con-

ferring with other central office administrators and principals about highly qualified teacher requirements and related changes in teaching assignments). Due to the burgeoning central office workload, both Fairview and Steele assigned “extra duty” such as supervision of Title I or Title III programs to principals of smaller buildings.

District protocols and regulations. Administrators assigned to particular implementation requirements had the task of developing related district protocols and regulations. This often necessitated getting further clarification from External Partners to ensure districts stayed in compliance as they made local decisions. The ISD Assistant Superintendent noted ISD staff spent “a great deal of time and vigilance monitoring legislative sites for pending legislation and changes in mandates.... Revisions to regulations...are probably even more important than the legislation itself.” Thus, as Fairview’s Director of Educational Services put it, “We were in constant communication with the state and the ISD. Every day we’d get e-mails with multiple attachments. The state had periodic inservices, and we had monthly ISD meetings to help us understand what we needed to do.” Given some of the NCLB implementation timelines, i.e. for highly qualified teacher requirements and student assessments, responding to the requirements was a years-long process.

Channels of communication and accountability. As the Steele Assistant Superintendent described it, “communicating NCLB requirements and local processes to all involved—principals, teachers, parents—is an unending task.”

In both Fairview and Steele, the superintendents played a role in discussion and decision making, but relied heavily on administrators with specialized expertise to communicate and monitor implementation. Superintendent-to-administrator communication about NCLB and administrative responsibilities did not appear to be clear and consistent, with central office administrators in both districts reporting the superintendents sometimes “selectively ignored” principals’ noncompliance with regulations. Further, the district superintendents professed values consistent with the ability of all students to learn and achieve at high levels, but neither was particularly in touch with NCLB-related work. Fairview’s superintendent commented he didn’t really monitor implementation: “I would say if there’s a glitch, I’m notified that we haven’t complied. ...I monitor other pieces of our work more closely.” And while the Steele superintendent described his responsibility to “put systems in place” to support NCLB, he acknowledged he wasn’t really sure what had taken place to change core instruction in classrooms to increase student achievement, other than curriculum changes at the high school. However, he did report that he “put a line in all principals’ performance evaluations that they have to improve student achievement in their buildings by at least 10%,” believing this to be a “powerful” link between district goals and principal practice. Other

NCLB related performance expectations were not reported by Fairview or Steele administrators.

Thus, while superintendents may have made decisions about assignment of responsibilities and resource allocation, other central office administrators took up the daily work of implementation and monitoring. Steele's Assistant Superintendent wryly commented, "Everything NCLB runs through me." Fairview's Director of Educational Services noted both superintendents she'd served with had "less and less of a role in [NCLB]" as time went on, doing "very little that's implementation." The information hub was Central Office, with administrators providing what one Fairview principal described as "regular and frequent updates."

Significantly, Fairview and Steele principals' self-identified levels of knowledge of NCLB varied greatly, depending somewhat on individual interest. One Fairview principal commented, "I'm a research buff, so I got copies of the legislation and read it myself," while another claimed bluntly not to "really know the requirements. I couldn't list them for you. It's one of those things everybody talks about.... I mean, we know by 2014 everybody's supposed to be proficient.... That's the extent of [my knowledge]," observing she hadn't "felt a need" to understand the particular requirements. One Steele principal stated his NCLB knowledge was "minimal" stating, "I mostly just call the Assistant Superintendent if I have a question." Several Steele administrators referred to the "chain of command" for NCLB issues, with the Assistant Superintendent occupying the top position.

Principals' inconsistent knowledge may have been partly responsible for flawed implementation. Some NCLB requirements met with administrator resistance and outright opposition, particularly in Steele. Four Steele central office personnel shared stories of principals' noncompliance with federal grants and Title I regulations, and highly qualified teacher requirements. Steele lost its federal Reading First grant due to poor implementation and noncompliance, which the Director of Grants described as "very disturbing." Noncompliance with special education law connected to NCLB also proved problematic. Steele's Special Services Director continued to work for increased participation of special education students in general education classrooms, noting "we have an ongoing battle of inappropriate referrals, placements and scheduling of Special Ed and also ELL students." This latter issue was confirmed in the 2007 state monitoring report of Steele's special education practices, which included several citations for these issues. The Special Services Director reported that administrators and teachers did not grasp the connection between NCLB's mandate to raise student achievement and special education students' access to general education curricula.

The superintendents' rather loose monitoring of NCLB and their administrators' general performance did not go unnoticed by Fairview and Steele central office personnel. Key administrators in both districts complained of building principals' poor performance and weak accountability.

Moreover, central office administrators cited their lack of authority to hold principals accountable, because in the words of one Steele administrator, the principals “just go running to Daddy [the superintendent] when they don’t like what Mommy [female central office administrators] says,” also charging weak accountability practices to the “good ole boys’ network” of superintendent and favored principals. A Fairview administrator said she doubted “whether the superintendent would back me up” if she tried to hold principals accountable for NCLB requirements, citing an example of the superintendent reversing a Title I compliance decision she’d made, because “he preferred to pacify the principal and staff.” Another Steele administrator commented there are schools where principals “don’t have to answer for anything, they can do what they want. ...[And] there are leaders that allow that to happen.” Unfortunately, she believes the highest-need buildings have the weakest principals and teachers, because “we know this group of parents is not going to complain.” The irony is that the administrators with arguably the greatest knowledge and responsibility for NCLB implementation had the least authority for ensuring requirements were implemented with fidelity.

What administrative challenges are created by these mandates? What conflicts do they pose for districts? Overall, both Fairview and Steele administrators struggled to effectively connect NCLB’s core purposes to their educational practice and student learning. This may reflect a developmental stage in responding to external mandates, in which preoccupation with understanding and complying with basic requirements precedes deeper change, consistent with the increased difficulty of second order change (Watzlawick, Weakland, & Fisch, 1974). Second, some of Fairview and Steele’s deeply embedded educational and social values appeared to conflict with NCLB’s tenets. Finally, districts may lack capacity to significantly raise student achievement, either because they are not collaborating effectively or do not possess the knowledge and skills necessary to effect deep changes in classroom practice.

Early preoccupation with NCLB requirements. As estimated by the ISD Assistant Superintendent, NCLB contains between 400–500 compliance standards, with frequent tweaks and revisions released by the US Department of Education. She commented that districts become distracted by “the stick of accountability,” saying, “I think we are so mechanized in education to responding to the mandates of the day that we really do lose sight of the values and beliefs underneath that.” Thus, she saw districts scrambling to learn about NCLB and wading through the “managerial details.” This is an excellent representation of Fairview and Steele’s responses to NCLB. As Fairview’s Director of Educational services described it, implementing the new NCLB requirements supplanted responsibilities she’d previously considered as the core of her work, saying she was “not so much doing curriculum as working on these mandates.... I heard that

song from every Curriculum Director—they were so overwhelmed, so overburdened...that they were having a hard time doing curriculum.”

Hence, learning about and instituting NCLB requirements elicited bureaucratic actions spanning a period of at least three to four years. Districts’ early cries of outrage over proficiency standards and other requirements were temporarily swept aside as they began compliance work. There was a sense that Fairview and Steele had never fully acknowledged or addressed their fundamental conflicts with NCLB.

Conflicts between district values and NCLB tenets. Administrators in both districts described varying perspectives on NCLB. While a few key administrators welcomed NCLB as a lever for work they regarded as important, some viewed it as far more problematic than helpful. The majority of building principals did not seem to connect NCLB work to school improvement. In addition, they did not report that NCLB’s values of equity and universal student proficiency were consistently reflected in leadership or classroom practices.

Fairview administrators were candid about the conflict between NCLB and deeply held district values. Fairview’s superintendent stated, “I think I’ve said publicly multiple times that it’s very challenging to argue with the spirit of No Child Left Behind. It’s a very appropriate spirit.” However, as noted by the Director of Educational Services, “Our district has always valued all students succeeding to a point...but [we] always put a lot of emphasis on the high ended kids, not so much the low.” This coincides with Fairview’s Strategic Planning documents, which list NCLB as an “externally imposed threat” to gifted and talent student programs. Fairview’s Finance Director verbalized similar sentiments, questioning whether NCLB is really “doable” and whether it is “hindering other students.” The Fairview focus group of four principals acknowledged that while they thought the majority of administrators “believe in the spirit of NCLB... [there are] some underground attitudes that NCLB is just a waste of time and resources.” They believed this was also true of teachers. One principal reported her teachers don’t appear to pay much attention to NCLB, and when confronted with achievement gap data, “There’s always excuses and rationale [instead of saying] ‘Boy, I really ought to look at my practice so I can help these kids be more successful.’”

Similarly, Steele also struggled with the gap between NCLB tenets and their educational values and practices. The superintendent noted this was particularly apparent with teacher attitudes toward students with disabilities, believing disabled students should be educated in separate classrooms, not in general education, where they may “bring down” the rest of the students. Steele’s Assistant Superintendent estimated approximately 65% of their teachers are doing all they can to increase student learning, but acknowledged they have a vocal minority who do not. Other central office administrators noted value conflicts within the administrative ranks as well. One Steele central office staff person commented, “About 50% of

the principals try to skirt NCLB, one way or another.” Likewise, the Director of Grants reported many principals and teachers were not committed to making instructional changes to raise student achievement. She cited anecdotes of confronting their prejudicial attitudes toward children of racial minority or economically disadvantaged backgrounds.

The ISD Assistant Superintendent recognized the potential for value conflicts to undermine meaningful change congruent with NCLB’s purposes. She stated, “We’ll comply with the mandates if we have the moral imperative in place,” and is hopeful that “collective commitment” to raising student achievement will grow over time.

Insufficient district capacity for change. Currently, neither Fairview nor Steele appear to have the capacity required to effect long-term, deep changes in district, school, and classroom practices. As noted in previous sections, administrative workloads have increased, decreasing instructional leadership time for teacher collaboration. In addition, the data collected for this study does not demonstrate whether Fairview and Steele administrators have the knowledge or skills to facilitate improved classroom practices, thereby raising student achievement. It is likely that both leader and teacher capacity needs to grow before significant student achievement gains may be realized.

Discussion

The purpose of this study was to describe and explain the response of P–12 districts to policy mandates introduced through federal legislation. The previous section elaborated findings in accordance with the exploratory research questions. This section describes how the findings measure up against prevailing organizational theory, and proposes the Compliance, Commitment, and Capacity Model (CCCM) to explain P–12 districts’ responses to policy mandates. Finally, the study’s limitations are discussed and used to suggest further research.

Organizational Theory and Findings

The predictions of organizational theories and the conceptual framework were reflected in this study’s findings. Particularly in their early responses to new policy mandates, Fairview and Steele employed bureaucratic methods to address requirements, such as assignment of specialized responsibilities to individuals and departments, development of internal protocols and regulations for managing requirements, and establishing communication channels and lines of authority for implementing and monitoring the requirements. Given the budget constraints in both districts, these tasks were managed with fewer individuals. Collaboration increased between administrative personnel and departments, with coalitions emerging between key personnel, while school administrators took

on new tasks such as administration of Title I or ELL programs. Thompson's predictions regarding increased monitoring of the task environment held true, with SEA and ISD consultants providing particular assistance with this task. However, heightened decision making at top levels appeared to be reserved in many cases for the superintendent, limiting the authority of other central office administrators.

Institutional theory also proved helpful, especially its emphasis on the institutional environment and organizations seeking legitimacy through isomorphism. Steele's changes in job titles to Assistant Superintendent for Student Achievement and NCLB Compliance Coordinator seem particularly symbolic. Moreover, administrators' reports of less time spent in schools and classrooms appeared to reflect decoupling of structural units to accommodate the increased workload associated with administration of institutional rules under NCLB.

Consequences of districts' structural and functional responses to NCLB, as outlined by the study's conceptual framework (Figure 1), were not always clearcut. Ample evidence existed for strengthened external coalitions with SEA and ISD External Partners, as districts relied heavily on their knowledge and interpretation of policy mandates, and to a lesser extent, with professional associations. Information on research partnerships did not emerge in the study, however. There also appeared to be some increased administrative turnover, particularly in Fairview, although this could not be connected to the district's responses to NCLB. Evidence was less clear regarding decreased local control and changes in organizational performance. Administrators certainly perceived they had decreased local control over educational programming, teaching assignments, and expenditure of federal funds. However, local control was also evidenced through careless or deliberate noncompliance with federal regulations. Whether the districts' performance changed substantively, particularly their student achievement outcomes, is debatable. Quantitative evidence on student achievement was not collected or analyzed. However, according to estimations by Fairview and Steele administrators, none regarded their districts' improvement trajectory remotely strong enough to realize 100% student proficiency by 2014. Thus, further explanation of their responses and what they did and did not achieve is needed.

The CCCM Model: Explaining P-12 Districts' Responses

The CCCM model (Figure 2) breaks districts' responses to policy mandates into three developmental stages, each subdivided into one or more steps. Study data developed into themes that roughly mapped onto Hall and Hord's Concerns-Based Adoption Model (CBAM). Comparisons between CCCM and CBAM are summarized in Table 2.

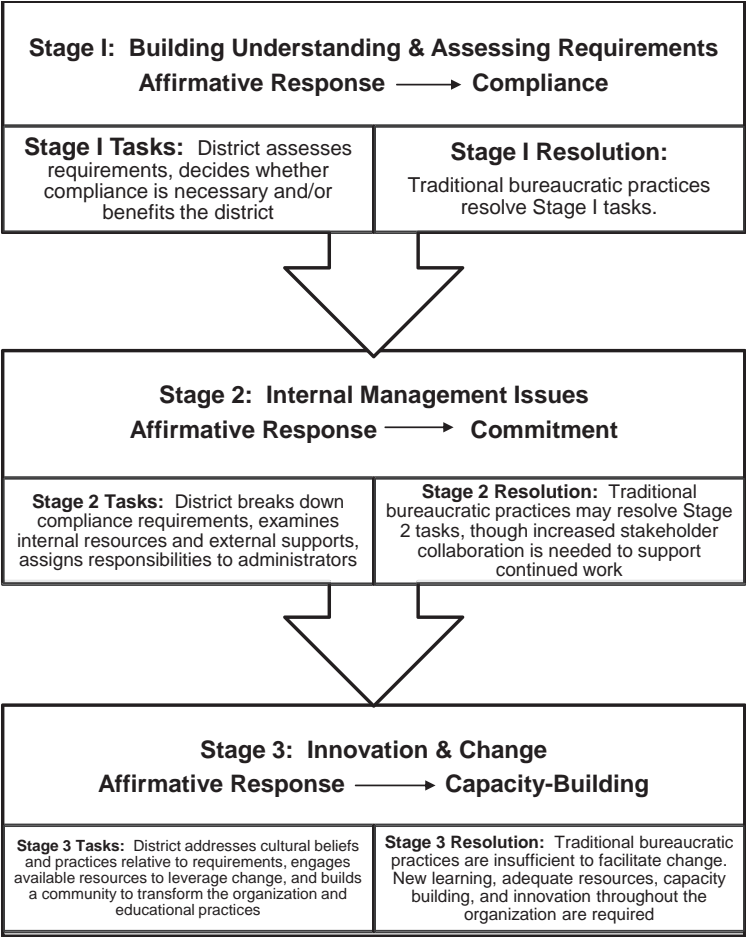


Figure 2. Stages of P–12 districts’ responses to legislative mandates.

Table 2
Comparison of CBAM and CCCM

Features	CBAM	CCCM
Theoretical base	Fuller’s Concerns Theory	CBAM & Concerns Theory Bureaucratic Theory Contingency Theory Institutional Theory

(continued)

Table 1 (*continued*)

Features	CBAM	CCCM
Primary focus	Individual responses to change	Organizational responses to change
Stages summary	7 Stages of Concern ^a ranging from 0 (Awareness) to 6 (Refocusing)	3 stages of P-12 districts' responses to legislative mandates with 7 steps
Detailed stages	0–Awareness 1–Informational 2–Personal 3–Management 4–Consequence 5–Collaboration 6–Refocusing	1–Understanding & assessment (Compliance) 1a–Building understanding 1b–Assessing requirements 2–Internal management issues (Commitment) 2a–Requirements & resources 2b–Responsibilities & regulations 3–Innovation & change (Capacity) 3a–Ideological/cultural conflicts 3b–Resources & capacity-building 3c–Innovating educational practices
Applications	Self-understanding Use by leaders to assist others with concerns Leadership planning for change Theory & research	Collaborative assessment of organizational responses to policy mandates Collaborative organizational planning Theory & research

Note. ^aDescription of CBAM adapted from Hall & Hord (2001). They also identify “Levels of Use,” ranging from nonusers, as well as the “Hall Innovation Category (HiC) Scale,” which rates the size of innovation and effort needed for implementation.

It is important to note that districts' responses may never progress beyond Stage 1, depending on mediating contextual factors and decision making. Movement from one stage to the next depends on successful resolution of the previous stage's tasks, but micro movements between stages are likely, with fits of activity in a new stage or regression to a former stage. In addition, reactions that enable and/or inhibit implementation of mandate requirements may be observed at each stage. Organizational responses evolve over the stages from primarily bureaucratic to building district capacity and resources to facilitate change.

Stage 1: Building Understanding and Assessing Requirements (Compliance)

Districts' Stage 1 responses have two steps: building understanding and assessing requirements. In the first step, district administrators receive information about new federal policy mandates, interpreted and disseminated through SEAs, regional consortia, and professional associations. Early responses focus on information-gathering through administra-

tors specialized by role (i.e., finance, instruction, and human resources). In the second step, district administrators assess requirements through external coalitions with SEA and regional consultants and internal discussions with other administrators. Enabling reactions include the belief that mandate requirements are congruent with district values, while inhibiting reactions may be seen in willful or subtle avoidance of requirements. Significantly, if there are no perceived consequences for noncompliance, or the district perceives compliance will not provide benefits, the district's response may end at this stage. Satisfactory resolution requires a working understanding of the mandate requirements, but more importantly, the district decides it will comply with requirements.

Stage 2: Internal Management Issues (Commitment)

Districts' Stage 2 responses have two steps: breaking down compliance requirements, weighing them against internal resources and external supports, and assigning responsibilities to administrators, who assume responsibility for developing district implementation protocols and regulations. These processes are mediated by available district resources, district history (including leadership history and past experiences with change), cultural beliefs related to requirements, and consultation with External Partners to solve unclear or challenging issues. Enabling reactions focus on purposeful organization of the district's responses and harnessing external assistance, while inhibiting reactions may include reactionary panic and preoccupation with bureaucratic minutiae. While traditional bureaucratic practices may partially resolve Stage 2 tasks, district work at this stage may reflect "letter of the law" compliance rather than deeper engagement with policy purposes. Districts may spend a long period of time working on these issues. If it is perceived that superficial compliance is "good enough" and there will be a lack of external monitoring or consequences, districts may stop at this stage. It is possible that resolution of some basic bureaucratic issues may be needed before districts can move toward engaging with deeper issues, or that concrete issues may drain district resources or forestall districts from responding in a manner that facilitates deeper change. Satisfactory resolution requires districts to deeply engage and commit to long term, second order change.

Stage 3: Innovation and Change (Capacity)

Districts' Stage 3 responses have three components: actively confronting ideological conflicts with mandate requirements and district cultural beliefs and practices, leveraging resources to build district capacity for change, and innovating practices to increase learning outcomes. In contrast to early Stage 2 responses, which focus on a more superficial commitment to change, Stage 3 is marked by a deepened belief that "business as

usual” will not suffice to meet mandate requirements. Work at this stage is mediated by leadership capacity throughout the district, and internal and external resources for leveraging change. Leaders’ actions embody the critical practices (Leithwood et al., 2004) of setting goals, developing people, and redesigning the organization. Enabling reactions include objective examination of district performance relative to mandate requirements, environmental scanning to learn about educational innovations to support change, and increased collaboration with internal and external resources for change. Inhibiting factors may include helplessness and planned inertia, structural constraints, and lack of human and financial capacity. Bureaucratic action at this stage is insufficient to facilitate change, and may have a chilling effect on innovation. New learning throughout the organization is required to create the conditions, knowledge, and skills to reconceptualize the organization, leadership, and student learning (Leithwood et al., 2004). Satisfactory resolution requires an increase in collective will and innovation to transform educational practices.

Summary of Findings, Study Limitations, and Research Recommendations

The study’s chief finding is that legislative policy mandates pose P–12 districts with an interesting paradox: while the educational bureaucracy appears well-equipped to satisfy concrete compliance requirements, bureaucratic action does not appear sufficient to produce deeper changes in practices required by educational reform mandates. The findings and CCCM model raise new questions related to legislative policy mandates and P–12 districts’ responses: Do districts have the capacity to facilitate deep changes in educational practice in response to legislative policy mandates? Further, do they know how to accomplish educational reform, and will they choose to do so?

The intent of this study was to contribute to the discourse on policy implementation in P–12 districts. Rather than asserting claims of causal relationships between mandate requirements and district responses, this narrative aims to describe and explain patterns observed in study districts’ responses, using them to elaborate the CCCM model. However, this study was relatively small in scope, holding to design parameters. Further research is needed to test and expand the CCM model. New studies may provide a more complete understanding of contextual differences in local districts and their impact on districts’ responses and outcomes, lending greater predictive value for policymakers seeking improved student learning.

Conclusions

While the findings suggest districts’ responses to NCLB are not adequate to achieve mandated outcomes, the question remains whether the policy itself is adequate (Center on Education Policy, 2007). As noted pre-

viously, evidence exists that previous policies have been unsuccessful in achieving their intents. Some researchers suggest NCLB sets districts up for failure, given districts' "isomorphic behavioral responses to NCLB [that] conflict with the pedagogical and leadership behaviors of the 21st-century schools movement," thus inhibiting innovative practices needed to transform schools (Schoen & Fusarelli, 2008).

Other researchers suggest accountability-driven policy is insufficient to facilitate educational reform (Vinovskis, 2009). Darling-Hammond (1993) warns that testing cannot create true accountability, which can only be achieved through inquiry, discourse, and an unrelenting focus on students and their needs. She notes, "Schools have tried to implement bureaucratic rules and procedures by burying the dialogue that would allow real problems to emerge" (p. 760). Given NCLB's focus on sanctions for noncompliance, it appears policymakers and educators share complicity for adherence to bureaucratic routines to the detriment of confronting ideological and practice-related issues, thus ensuring schools stifle their implementation of reform mandates.

Capacity issues further defeat districts' attempts to comply with educational reform requirements. Cohen et al. (2007) conclude, "The realization of policy in practice depends on the fit between capabilities that support implementation and aims. The more aims outstrip capabilities, the less likely is effective implementation" (p. 515). This leads to a superficial response to mandates, dubbed by Debray, Parson, & Woodworth (2001) as "compliance without capacity" (p. 189), coinciding with patterns observed in Fairview and Steele. Current literature abounds with suggestions to improve NCLB and future legislative policies (Center on Education Policy, 2007; Hannaway & Woodroffe, 2003; Harris & Herrington, 2006; Mintrop & Sunderman, 2009; Vinovskis, 2009). New learning is required to implement instructional policy, a critical contingency policymakers would be wise to consider as new policies are conceptualized (Cohen & Hill, 2007).

It is also apparent heightened levels of collaboration are needed to support districts' reform efforts. A recent report by The Wallace Foundation (2009) outlines suggestions for state, district, and local actors for policy coordination, turning around low-performing schools, increasing district and school leaders' capacity to lead change, and educational leadership preparation. Finally, reflecting on our country's history of using public schools to address larger social and economic issues, Mintrop and Sunderman (2009) assert policy makers need "to think about school reform differently and acknowledge that schools alone cannot overcome the...inequities in our society that contribute to unequal educational outcomes," (p. 361). They suggest shared responsibility and comprehensive investment in student welfare, facilitated through substantive partnerships between government actors, educators, and parents and community members, is required to transform student outcomes.

End Notes

¹Fairview Community Schools and Steele Public Schools are pseudonyms to protect the districts' identities, per Institutional Review Board protocol and district agreements.

²Following this Midwestern state's educational finance reform legislation in 1994–95, designed to reduce inequities in school funding, districts receive per pupil foundation allowances, which are partially based on their spending prior to 1994–95. Given pre-1994–95 district spending variations, the foundation allowances allocated to districts also vary, though the disparities have been reduced. In 2007, when this data was collected, Fairview's per-pupil allocation was \$8,517, while Steele's was \$7,137.

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Appendix

*Semi-structured Interview Protocol

*Note: The primary questions are identified with a “Q,” and were asked of each person interviewed. Follow-up probes are listed beneath the primary questions, and were used as needed to yield additional information.

Introduction:

Q: What is your position within this organization? (district, ISD)
How long have you held this position?

Concerning How Districts Learn About and Assess Mandate Requirements:

- Q: How do you learn about the requirements of No Child Left Behind (NCLB)?
- a. How does initial and subsequent information about mandate requirements come to your attention?
 - b. What information resources do you access to learn about mandate requirements?
- Q: What is involved in assessing the various requirements?
- a. Are there others you consult either internally or externally to assess requirements?
 - b. How much time is involved in assessing mandate requirements?
- Q: What are your responsibilities with regard to No Child Left Behind?
- Q: How were these responsibilities assigned to you?
- a. Have there been changes in assigned responsibilities for mandates to administrators over time?
 - b. What prompted the change in assigned responsibilities?

Concerning District Response to Mandates and Monitoring of Implementation:

- Q: Who is involved in implementation and monitoring of NCLB?
What do they do?
- a. Do you share assigned responsibilities for NCLB requirements with other district administrators?
 - b. Do you organize and assign work to others? How does this work?
- Q: Are there others outside of the district who assist you with your assigned responsibilities?
- a. Who assists you and what is their role?
 - b. Are special interest groups involved in implementation and monitoring of the mandates?

Q: How does communication of NCLB requirements take place within the district?

- a. Are there specific structures for this communication?
How do they work?
- b. Please describe the purposes of these communications.

Q: How do you monitor implementation of NCLB requirements?

- a. What are some different ways you monitor implementation?
- b. Are there others who help you with this? What do they do?

Q: What percentage of your time do you spend in responding to NCLB and monitoring district implementation?

Q: Do you monitor NCLB implementation closely? Please explain.

Concerning Administrative Challenges/Conflicts Posed by Mandates:

Q: Are district resources adequate to address NCLB requirements?

- a. Have the available resources changed over time?
- b. Are the resources dedicated to responding to the mandates commensurate with resource allocation to implementation of other federal and state mandates (i.e., IDEA, finance and pupil accounting)?

Q: Are NCLB requirements congruent with district values?
Are they congruent with your values and beliefs?

Q: Would you say the district implements NCLB with fidelity, or with less than full compliance? How is this represented to others within and outside of the district?

Q: Do you perceive NCLB requirements as unbending institutional structures that regulate your daily work, or do you generally ignore the mandates and create your own structures and rules to guide you?

Q: What is the role of special interest groups in district planning, implementation, and monitoring of NCLB?

- a. What are your beliefs about the involvement of special interest groups?
- b. Do special interest groups create challenges for you relative to the mandates?

Q: Are there things you are unable to do because of NCLB requirements and your workload?

Thank you for your time and participation in this study.